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Court Appointed Class Counsel

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TZIVA RAPOPORT-HECHT, MAGGIE
TSAN, and ERICA WILDSTEIN,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SEVENTH GENERATION, INC.,

Defendant.

No. 7:14-cv-09087-KMK

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES TO CLASS COUNSEL AND
INCENTIVE AWARDS TO THE CLASS
REPRESENTATIVES**

PLEASE TAKE NOTICE that on January 26, 2017, at 2:00 p.m., in the U.S. District Court for the Southern District of New York, in Courtroom 521, in The Honorable Charles L. Brieant Jr. Federal Building and U.S. Courthouse, 300 Quarropas Street, White Plains, New York 10601-4150, before the Honorable Kenneth M. Karas, Plaintiffs Tziva Rapoport-Hecht, Maggie Tsan, and Erica Wildstein will, and hereby do, move the Court for an order granting payment of \$1,500,000 for Class Counsel's fees and expenses and payment of \$5,000 to each of the named plaintiffs (for a total of \$15,000) for their efforts and contributions to this matter.

The motion is based upon this notice of motion; the accompanying memorandum of law; the Declaration of Michael R. Reese; the Declaration of Melissa W. Wolchansky; the Declaration of Jeffrey D. Kaliel; the Declaration of Jason P. Sultzer; the Declaration of Tziva Rapoport-Hecht; the Declaration of Maggie Tsan; the Declaration of Erica Wildstein; all of the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

Date: December 13, 2016

Respectfully submitted,

REESE LLP

By: /s/ Michael R. Reese

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